

Message

From: Bateson, Thomas [Bateson.Thomas@epa.gov]
Sent: 4/21/2016 9:04:34 PM
To: Glenn, Barbara [Glenn.Barbara@epa.gov]; Kraft, Andrew [Kraft.Andrew@epa.gov]; Bussard, David [Bussard.David@epa.gov]
CC: Jinot, Jennifer [Jinot.Jennifer@epa.gov]; Subramaniam, Ravi [Subramaniam.Ravi@epa.gov]; Birchfield, Norman [Birchfield.Norman@epa.gov]
Subject: FW: URGENT! FW: Interagency review comments on formaldehyde in composite wood products (CWPs) rule
Attachments: EO 12866_13563 EPA Formaldehyde 04-20-16.docx; RIN2070-AJ44_EO12866_Formaldehyde_FRM_EA_2016-03-24.docx; RIN2070-AJ44_EO12866_Formaldehyde_FRM_FRdocument_2016-03-11.docx

Importance: High

I have attempted to answer all of the questions but there is one for Barbara (#47) and one for Ravi (#23).

For several, I have included comments and statements back to OPPT. If you have input on those, please share it within NCEA

Please review, advise and keep me in the loop.

OPPT and OSP will likely want to know our timeline for responding.

Thanks,
Tom

From: Cuje, Jace
Sent: Thursday, April 21, 2016 12:58 PM
To: Glenn, Barbara <Glenn.Barbara@epa.gov>
Cc: Kraft, Andrew <Kraft.Andrew@epa.gov>; Bateson, Thomas <Bateson.Thomas@epa.gov>; Jinot, Jennifer <Jinot.Jennifer@epa.gov>; Berner, Ted <Berner.Ted@epa.gov>; McQueen, Jacqueline <McQueen.Jacqueline@epa.gov>
Subject: URGENT! FW: Interagency review comments on formaldehyde in composite wood products (CWPs) rule
Importance: High

Barbara -- Good afternoon. Hope all's well with you and NCEA.

As I recall, we worked together on the Formaldehyde in CWPs final rule after Bob Sonawane (per his discussion with David) designated you as the NCEA representative, replacing him as a workgroup member. Accordingly, forwarding the below thread and requesting your assistance in responding to OPPT.

Briefly, OPPT is requesting ORD input and assistance in responding to interagency comments #5, #6, #13, #23, #28, #29, #33, #36, #37, #42, #45, #47, #64, #65, #66, #67, #68, and #69. A subsequent OPPT email (which I'll forward to all, directly) elaborates on Comment #6. While some responses may be easy, others may raise significant issues. Either way, **we need to respond to OPPT with either substantive responses or a reasonable estimate of when we expect to provide responses** (e.g., five additional working days).

I propose that you consider the questions and timing **within NCEA** and reply to me ASAP with your preferred path forward ... we can proceed from there. Alternatively, I can schedule an internal call to further discuss this request.

Please consider and reply/call with urgent questions, comments or concerns; otherwise, I'll await NCEA's preference and proceed accordingly.

Thanks in advance and best wishes. ~~~ Jace

From: Silagi, William
Sent: Thursday, April 21, 2016 10:50 AM
To: Cuje, Jace <Cuje.Jace@epa.gov>
Cc: Winchester, Erik <Winchester.Erik@epa.gov>; Wheeler, Cindy <Wheeler.Cindy@epa.gov>
Subject: Interagency review comments on formaldehyde in composite wood products rule

Jace,

As the ORD representative to OPPT's formaldehyde rule workgroup, I should have included you on the email below. As noted below, we have received interagency review comments on the formaldehyde rule. OCSP's policy is to respond to interagency review comments within 3 working days. Where a substantive response cannot be provided in that timeframe, the response should indicate how long we expect to need to provide a response (e.g., five additional working days).

As such, I have to provide a draft set of response for OPPT management review by Monday afternoon.

I would appreciate ORD's input on responses to the comments on health effects, or predictions of how long it will take to respond.

William Silagi
Economic and Policy Analysis Branch
U.S. EPA Office of Pollution Prevention and Toxics

From: Silagi, William
Sent: Wednesday, April 20, 2016 4:48 PM
To: Bateson, Thomas <Bateson.Thomas@epa.gov>; Jinot, Jennifer <Jinot.Jennifer@epa.gov>
Subject: Interagency review comments on formaldehyde in composite wood products rule

OMB has provided the first set of interagency review comments on the formaldehyde rule. The comments, which address both the EA/RIA and the Federal Register document, are attached. I have also attached the EA and the FR notice, in case you would like to see the full context of the text the comments are addressing.

Some of these comments are about the discussion and estimation of health effects. **I would appreciate ORD's input and assistance in addressing the following comments in the first attachment: #5, #6, #13, #23, #28, #29, #33, #36, #37, #42, #45, #47, #64, #65, #66, #67, #68, and #69.** Some of these are duplicates (addressing the same issue in both the EA and the FR). And in some cases the request is fairly simple (although if we disagree with a comment, the response may not be so simple.)

There is no set deadline for responding to the comments, but OCSP's policy is to respond as quickly as possible in order to keep the process moving and complete OMB review within the 90-day timeframe. I would appreciate it if you could give me some sense of when you think ORD may be able to provide input on responses.

OPPT is having a meeting with OP and OGC at 9 am tomorrow (Thursday, 4/21) in EPA East room 3371C to review the comments and discuss how to respond to them. You are welcome to attend that meeting, although it is by no means required. If you'd like to call in, the number is Ex. 6 Personal Privacy (PP)

I'm also happy to have a separate phone call at some other time if you'd prefer to discuss the comments and potential responses that way.

Please let me know if you have any questions. Thanks for your continued support for this rulemaking activity.